		D STATES DISTRICT COURT RN DISTRICT OF PENNSYLVANIA
vs.	Plaintiff,	) ) ) ) ) ) ) ) Judge J. Nicholas Ranjan ) )
	Defendants.	)
	Fed. R. Civ. P. 2	6(f) REPORT OF THE PARTIES
<u>Sub</u>	jects of Fact Discovery:	

## 2. Subjects of Expert Discovery:

1.

3. Can fact and expert discovery occur at the same time? Why/why not?

4. <u>Pre-trial Deadlines:</u>a. Date for Initial Disclosures:

	<b>b.</b> Date for joinder/amendment:	
	<b>c.</b> Date for close of fact discovery:	
	<b>d.</b> Date for close of expert discovery, if bifurcated:	
<b>5.</b>	Rule 502 Order – Yes or No?	
6.	Are there any ESI disputes? If yes, please explain:	
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7.	<u>Protective Order – Yes or No?</u>	
		Respectfully submitted,